REMARKS

Claim 1 calls for a first and second layer of memory material spaced from one another in a first direction and a first and a second address line extending substantially in that first direction through the first and second layers. Therefore, the claim requires memory layers and it requires address lines that extend through those memory layers.

Claim 1 is rejected under Section 102 as being anticipated by Toyama. But Toyama teaches a DRAM, SRAM, or ROM and, therefore, has no memory material. These devices simply work on integrated capacitors and have an absence of any memory material. Moreover, there is no address line through any memory material, at least in part, because there is no memory material.

Some claims were also rejected over the reference to Tuttle that mentions the possibility of a ferroelectric memory. But ferroelectric memories in general do not have layers of memory material in the claimed arrangement and necessarily do not have first and second address lines extending in the direction in which the first and second layers are stacked "through said first and second layers." In other words, conventional ferroelectric memories do not have layers stacked on top of each other and they do not have address lines running in one embodiment in the vertical direction through those memory material layers.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

Date: August 29, 2006

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